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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Establishment of Public Service Radio Pool in the Private Mobile Frequencies Below 800 MHz

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RM-9405

COMMENTS OF NEW ENGLAND POWER SERVICE COMPANY

Pursuant to Section 1.405 of the FCC's Rules, New England Power Service Company hereby submits its Comments in support of the above-referenced "Petition for Rulemaking" filed on August 14, 1998, by UTC, The Telecommunications Association (UTC), the American Petroleum Institute (API), and the Association of American Railroads (AAR).

Introduction

New England Power Service Company provides telecommunications (and other) services to the operating companies of the New England Electric System, namely: Massachusetts Electric Company and Nantucket Electric Company in Massachusetts; The Narragansett Electric Company in Rhode Island and Granite State Electric Company in New Hampshire and New England Power Company, a regional transmission company.

The New England Electric System operating companies use mobile radio systems, licensed by the Federal Communications Commission to conduct daily operations including the dispatching of work crews, electrical system switching orders, etc. These systems are a crucial element in the provision of electrical energy to the public in a safe, efficient and reliable manner. They become particularly important during major storms that cause wide spread power system outages.

Comments

Adoption of the referenced "Petition for Rulemaking" is clearly in the public interest. The electrical network is a critical component of the infrastructure that supports businesses, industries and individuals in their every day lives. The mobile radio systems used by The New England Electric

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System are a crucial element in the delivery of electrical energy to the public in a safe, efficient and reliable manner. In addition to daily operations, they are used to dispatch work forces to restore power when interrupted. During power outages many, particularly the elderly and infirm, may be placed in jeopardy. Delays in restoring power could cause considerable pain and suffering. Of particular concern in the northeast during the winter months, heating systems can become inoperative without electricity to operate the controls. Mobile radio systems play a vital role in the prompt restoration of electrical service.

Interference to the mobile radio system simply cannot be tolerated because it would cause delays in restoring power to the public.

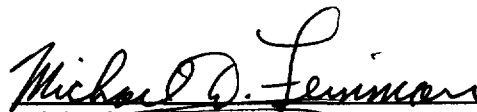
The New England Electric System is concerned that the present system of competitive frequency coordination does not properly recognize the critical nature of its operations in the delivery of electrical energy to the public. The present system recognizes on the one hand that public safety services such as police and fire organizations should receive a certain level of protection from entrepreneurial users of the radio spectrum, yet on the other hand fails to recognize that the public service nature of public utilities (and other organizations using mobile radio systems in support of critical infrastructure) require similar protection. Coordination of other nearby users on radio channels used for the restoration of power will cause delays in the restoration of electric power with an attendant impact on the safety of the life, health and property of the public.

Conclusion

In conclusion, New England Power Service Company supports the Petition for Rulemaking, and urges the FCC to promptly issue a Notice of Proposed Rulemaking looking toward the creation of a Public Service Radio Service as described in the Petition.

Respectfully submitted,

NEW ENGLAND POWER SERVICE COMPANY

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Dated: December 18, 1998

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of New England Power Service Company" was sent by first-class mail, postage prepaid, to the following persons this 22ND day of December, 1998.

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